

MAR 10 1993

Mr. John Haggard
 General Electric Company
 Corporate Environmental Programs
 1 Computer Drive South
 Albany, New York 12205

Re: Hudson River PCBs Site - Congener-Specific PCB Analysis

Dear Mr. Haggard:

EPA has reviewed General Electric's (GE'S) methodology for congener-specific PCB analysis of sediments and soils. This analytical procedure is part of the Fort Edward Dam, PCB Remnant Deposit Containment, Post Construction Monitoring Program, Quality Assurance Plan.

In general, the analytical method does not meet the stringent Quality Assurance/Quality Control (QA/QC) requirements of the Contract Laboratory Program. It lacks specific techniques which are used to generate definitive data. The following deficiencies were observed:

1. The method does not require confirmation of PCB congeners by a second GC column or analysis by another method such as GC/MS or GC/HECD. Subsequently, false positive results may be produced.
2. The method calls for a single-point calibration instead of a multi-point calibration. Without the multi-point initial calibration the actual analyte concentration is uncertain.
3. The method does not require the use of surrogate standards to monitor sample extraction and clean-up efficiency.
4. Laboratory performance cannot be adequately demonstrated because there is no requirement for the analysis of lab control samples and performance evaluation samples.

Because of the above deficiencies, EPA may have difficulty evaluating the quality of the results obtained by this method.

SYMBOL --->	ENYCS II							
SURNAME --->	TOMCHUK							
DATE ----->	3/10/93 DJT							

If you have any questions, please feel free to contact me at
(212) 264-7508.

Sincerely yours,

Douglas J. Tomchuk, Project Manager
Hudson River PCBs Site Reassessment

cc: Al DiBernardo, TAMS

bcc: Stelios Gerazounis, MMB
Kevin Kubik, MMB
Laura Scalise, MMB